



October 3, 2012

Mr. Scott Hatton
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Subject: An additional Comment on the Tentative Waste Discharges Requirements and the Monitoring for Hume Lake Christian Camps Waste Water Treatment Facility

Dear Mr. Hatton,

Thank you for allowing me to submit comments on the 'Tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility' and the Monitoring and Reporting Program R5-2012-XXXX.

I have one additional comment regarding finding 2 on page 18 under the Solids Disposal Specifications section that states, "... and Biosolids at the WWTF shall be temporary (i.e., no longer than two years)..."

Comment: As I read these words it seems like the thought of 'temporary' (which is appropriate) is clarified by the parenthesis limiting the time to: 'no more than 2 years' through the use of "i.e."

In general the Hume WWTF tries to keep biosolids no longer than 2 years, but under some circumstances (e.g. early winter, looking to further process the biosolids) the storage time may extend beyond the 2 year window. Looking at the 'Plan English Guide to EPA 503 Biosolids Rule', chapter 1 on both page 9 subpart C and page 12 figure 1-2, it seems to me that the 2 year time frame is a guide line not a fixed point. With your on-site visit to the 'temporary biosolids storage area' the site is clearly not a surface disposal site. Hume WWTF's temporary storage of biosolids that would extend beyond 2 years would be based on 'best management and operational practices'.

Recommendation: to broaden the language used in the parenthesis or underscore the 'temporariness' quality of the Biosolids storage site.

We appreciate the openness of the Regional Water Quality Control Board for allowing public comment on such documents.

Sincerely,

A handwritten signature in black ink that reads "Jon O. Nelson".

Jon Nelson
Hume Lake Christian Camps
Utility Manager